1 THE HONORABLE RICARDO S. MARTINEZ 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 QUINTE HARRIS, an individual, Case No. 2:22-cv-00555-RSM 10 Plaintiff, STIPULATION AND ORDER 11 REGARDING DEADLINE TO v. RESPOND TO COMPLAINT 12 SKANSKA, BALFOUR BEATTY JV, MICROSOFT CORPORATION, and 13 BALFOUR BEATTY CONSTRUCTION, corporations 14 Defendants. 15 16 IT IS HEREBY STIPULATED and AGREED by and between Plaintiff Quinte Harris 17 ("Harris") and Defendants Skanska USA Building Inc. and Balfour Beatty Construction, LLC 18 (the "Construction Defendants") and Defendant Microsoft Corporation ("Microsoft") pursuant 19 to Federal Rule of Civil Procedure 6(b) and LCR 7(d)(1) that: 20 1. Defendants' time to respond to the Complaint filed on or about April 25, 2022, and 21 22 served on Defendants on or about June 30, 2022 ("Complaint") is extended from July 23 21, 2022 to August 16, 2022. 24 2. Good cause exists for the agreed extension because Plaintiff is considering whether to 25 amend the Complaint, and extending the deadline for Defendants to respond to the 26 Complaint will serve the cause of efficiency by providing Plaintiff with the opportunity 27 STIPULATION AND ORDER TO EXTEND DEADLINE TO BRADLEY BERNSTEIN SANDS LLP 113 CHERRY ST. PMB 62056 **RESPOND TO COMPLAINT - 1** SEATTLE, WA 98104-2205

206.337.6551

Case No. 2:22-CV-00555

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to consider whether to amend his Complaint, and avoiding the need for Defendants to respond to a Complaint that may be mooted by Plaintiff's filing of an amended complaint.

- 3. The Court previously issued an Order Regarding Initial Disclosures, Joint Status
 Report, and Early Settlement on May 13, 2022 [Dkt. 4] ("Initial Scheduling Order"),
 but the deadlines in the Initial Scheduling Order passed before Defendants were served
 with the Complaint. The parties respectfully request that the Court issue a revised Initial
 Scheduling Order now that Defendants have been served.
- 4. No other dates have yet been set in the case, and the requested extension will not affect the dates in the Initial Scheduling Order, or any revised Initial Scheduling Order issued by the Court.

DATE: July 20, 2022.

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ORDER Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants should answer or otherwise respond to Plaintiff's Complaint on or before August 16, 2022. The Court will enter a revised Initial Scheduling Order. DATED this 21st day of July, 2022. RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE

I	<u>CERTIFICATE OF SERVICE</u>
2	I am a resident of the State of Washington, over the age of eighteen years, and not a party
3	to above-entitled action. My business address is 113 Cherry St. PMB 62056, Seattle, WA 98104-
4	2205.
5	I hereby certify, under penalty of perjury under the laws of the State of Washington, that
6	on the 20th day of July, 2022, I filed the foregoing document with the Clerk of the Court via the
7	CM/ECF system, which will give notice of such filing to the following:
8 9 10	Attorneys for Plaintiff John Cochran, WSBA #38909 PACIFIC PROPERTY LAW LLC 1367 North Falcon Drive Ridgefield, WA 98642
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23	Executed on the 20 th day of July, 2022, at Seattle, Washington.
24	
25	<u>/s/Heidi B. Bradley</u> Heidi B. Bradley
26	
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